



March 8, 2023

The Honorable Julie A. Morrison  
Illinois Senate  
401 S. 2nd St.  
Capitol Building  
Springfield, IL 62701-1727

RE: HB 3899

Dear Senator Morrison:

On behalf of the American Speech-Language-Hearing Association, I write to comment and provide recommended amendments on HB 3899, which amends the Medical Assistance Article of the Illinois Public Aid Code and provides that certain treatment shall be covered, including, but not limited to, psychiatric, psychological, rehabilitative, and therapeutic care. This amendment allows coverage of autism spectrum disorder through applied behavior analysis (ABA) services, under the medical assistance program. As written, this legislation impedes the ability of licensed speech-language pathologists to assess and treat communication disorders for individuals with autism spectrum disorder.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 228,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Audiologists specialize in preventing and assessing hearing and balance disorders as well as providing audiologic treatment, including hearing aids. Speech-language pathologists (SLPs) identify, assess, and treat speech, language, swallowing, and cognitive communication disorders. Over 9,500 ASHA members reside in Illinois.<sup>1</sup>

Autism spectrum disorder (ASD) is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors for which SLPs play a critical role in assessing and treating. Social interaction and communication, speech production, understanding, and using spoken and written language are examples of neurodevelopmental functions. They are not solely "behaviors."

ASHA maintains that SLPs should be included in any comprehensive assessment and treatment for individuals with ASD since SLPs are able to prioritize intervention objectives and coordinate planning for communicative success. While ABA therapists may work on an individual's behaviors, SLPs have the educational background that enables them to focus on feeding and swallowing, understanding and using language, social communication, literacy, speech production, and evaluating for and recommending appropriate augmentative and alternative communication supports.

Individuals with communication disorders, and their families, must be provided with a full complement of services designed to meet their individual needs. Allowing individuals without the appropriate education and training to make assessment decisions about an individual's communication needs may result in an inaccurate assessment and inappropriate recommendations for services to the family. Utilizing a team of qualified professionals including

physicians, mental health professionals, SLPs, ABA therapists, and others will ensure that an individual diagnosed with ASD receives a comprehensive assessment and the full complement of services necessary to meet their unique needs.

To address these concerns, ASHA offers the following recommended amendment to HB 3899:

**In section 5-30.11(4)** add Therapeutic care, meaning direct assessment or treatment in the following areas: (i) self care (ii) feeding; (ii) pragmatic, receptive, and expressive language; (iii) cognitive functioning; (iv) motor planning, and (v) sensory processing provided by a licensed speech-language pathologist, licensed occupational therapist, and licensed physical therapist consistent with the Illinois ABA Practice Act.

Thank you for your consideration of ASHA's recommended amendments to HB 3899. If you or your staff have any questions, please contact Doanne Ward-Williams, ASHA's director, state affairs, at [dwardwilliams@asha.org](mailto:dwardwilliams@asha.org).

Sincerely,



Robert M. Augustine, PhD, CCC-SLP  
2023 ASHA President

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<sup>1</sup> American Speech-Language-Hearing Association. (2022). *Illinois* [Quick Facts]. <https://www.asha.org/siteassets/advocacy/state-fliers/illinois-state-flyer.pdf>